

Tuesday, October 20, 2020

**By email**

The Honorable Katherine Polk Failla  
United States District Court for the Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007  
Failla\_NYSDChambers@nysd.uscourts.gov

Dear Judge Failla:

**Re: Sines et al. v. Yiannopoulos**

I write to clarify the nature of my sourcing on Richard Spencer, and to provide additional, definitive detail about the origins of the material I have been publishing on YouTube over the last couple of years. I also write today with an update on my attempts to source the recordings Plaintiffs seek. It is a regrettably short update: I have been unsuccessful.

It is commonplace for journalists to be vague, even to the point of inconsistency, about the nature and number of our sources. We must take every conceivable effort not to inadvertently identify those to whom we have given solemn assurances. But I have read your Order carefully, and I accept that you are in need of a concrete response. I am content to provide it.

**Source A**

Source A is the person from whom I received every video I published on YouTube and supplied to the Plaintiffs, along with basic descriptions of what the videos show. I have been in semi-regular contact with this person, who initially indicated that they would be willing to co-operate with Plaintiffs, but then subsequently:

- (a) insisted that I not disclose their name, even under seal, and;
- (b) denied that he had been the one to play me the recordings Plaintiffs are seeking.

That situation has not changed since you last heard from me. While his version of events does not match my recollection, I have little choice but to assume I could be wrong, and that therefore there exists a:

**Source B**

Source B would be the person who played me the tapes. I have a dim recollection of various individuals who were at the party on the evening in question, but I would only be speculating recklessly about which, if any, of them it could have been.

Thank you for your patience with me in these proceedings thus far, and for allowing me to file my submissions in this manner. If I can be of any further assistance in this case, please let me know.

Respectfully submitted

/s/ Milo Yiannopoulos